

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BURBERRY LIMITED and  
BURBERRY LIMITED,

Plaintiffs,

v.

JOHN DOE 1 A/K/A QIAO RENFENG A/KA QIU  
YANYANG A/K/A LIN RUI A/K/A CHEN DERONG A/K/A  
XUE BINXUAN A/K/A YONGBO LI A/K/A XIAO  
JINGJING A/K/A JIANG AI A/K/A XUZHEYE XUZHEYE  
A/K/A XU ZHEYE A/K/A ZHOUMINMIN A/K/A ZHAO LI  
A/K/A ZHENG LINTIAN A/K/A LINTIAN ZHENG A/K/A  
CHEN CHENG A/K/A YANG CHENG A/K/A HUANG  
YAYAN A/K/A WU JINGQING A/K/A WU WU A/K/A  
ZHANG LILI A/K/A CHEN MINXIA A/K/A LINXICHUN  
A/K/A XICHUN LIN A/K/A XUZIMI A/K/A XU ZIMI A/K/A  
HUANG BOMING A/K/A LIU GUOREN; JOHN DOE 2  
A/K/A LIUQING WU A/K/A/ WU LIUQING; JOHN DOE 3  
A/K/A HONGPUYI A/K/A WANGHAO A/K/A LIUTAO  
A/K/A LIMEI XIAO A/K/A XIAOLIMEI; JOHN DOE 4  
A/K/A CHEN XUE A/K/A CHEN DAI A/K/A CHEN DAIL  
A/K/A CHEN JUN YONG A/K/A CHEN XUEFENG; JOHN  
DOE 5 A/K/A WANG ZHENGLEI A/K/A SUN XIAN  
SHENG A/K/A XIANGSHENG WANG A/K/A WANG  
ZHENG LEI A/K/A ZHENGLEI WANG A/K/A ZHENG  
WANG A/K/A WANG XIAN SHENG; JOHN DOE 6 A/K/A  
HUANGMINJUN A/K/A WU LONGQI A/K/A LUO TINGFEI  
A/K/A QINFAN; JOHN DOE 7; JOHN DOE 8 A/K/A  
CHENQI A/K/A QI CHEN A/K/A JONE SMITH A/K/A LIN  
LIN A/K/A FJC004 A/K/A LE LE A/K/A JAMES D. HILL;  
JOHN DOE 9 A/K/A REN XIAOQING A/K/A XIAOQING  
REN A/K/A SUMMER A/K/A BUSINESS A/K/A AMY  
SMITH A/K/A XIONG TENG A/K/A XIONTENG A/K/A  
MIKE WANG A/K/A HE QIAN A/K/A DUOSIYIBEI A/K/A  
ANNIE HE; JOHN DOE 10 A/K/A JUNGLE KOO; JOHN  
DOE 11 A/K/A CHEN YIFAN A/K/A ZHANG SHI A/K/A LI  
CHANG A/K/A PENG PENG A/K/A WAN SAN SAN A/K/A  
MENG XIANG A/K/A GAN PING A/K/A FANG PING  
A/K/A CHEN ZHEN A/K/A KAI SHA A/K/A WANG BIN  
BIN A/K/A PING PING A/K/A LI MEIMEI A/K/A XU  
WANG A/K/A PING JIN A/K/A XUE JI MING A/K/A  
BOSER BOSET A/K/A WANG JIANG A/K/A WER ERW;  
JOHN DOE 12 A/K/A CHEN GUOPENG A/K/A GUOPENG  
CHEN; JOHN DOE 13 A/K/A WANGZHIQIANG A/K/A

Civil Action

No.: 12 Civ. 0479

**JUDGE GRIESA**

**SUPPLEMENTAL  
DECLARATION OF  
MELISSA ROTH, ESQ., IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR A  
PRELIMINARY  
INJUNCTION**

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YANG A/K/A ANDY A/K/A ONLY A/K/A LIURUOLAN;  
JOHN DOE 14 A/K/A WAN ZHENCAI A/K/A HUANG YAN  
A/K/A HUANG YAN JIN A/K/A YU MEI ZHANG A/K/A  
YANG WEN XUE; XYZ COMPANIES, AND JOHN DOES  
15-100,

Defendants.

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**SUPPLEMENTAL DECLARATION OF MELISSA ROTH, ESQ., IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

1. I am currently employed as Senior Intellectual Property Counsel - Americas for Plaintiffs.
2. Plaintiff Burberry Limited is a corporation duly organized and existing under the laws of the United Kingdom with a principal place of business at Horseferry House, Horseferry Road, London, SW1P 2AW, United Kingdom.
3. Plaintiff Burberry Limited is a corporation duly organized under the laws of the State of New York with a principal place of business at 444 Madison Avenue, New York, New York 10022.
4. Collectively, I will refer to the Plaintiffs Burberry Limited (US) and Burberry Limited (UK) as "Burberry."
5. I submit this supplemental declaration in support of Burberry's Motion for a preliminary injunction ("Motion").
6. As described in the Complaint and Temporary Restraining Order ("TRO"), the Defendants in this matter have registered and are using several Internet domain names incorporating one or more of Burberry's federally registered trademarks (the "Burberry Trademarks") or a confusingly similar variant thereof (collectively, the "Infringing Domain Names") in association with a number of Internet websites selling and offering for sale

counterfeit Burberry-branded products (the “Infringing Websites”).

7. By assessing common email and Internet Protocol addresses (“IP addresses”), registrant information, contact information, payment transaction information, and other linkages between the Infringing Domain Names and Infringing Websites, the Plaintiff’s Complaint identified fourteen (14) distinct groups of Defendants (hereinafter, the “John Doe Defendant Groups”) that have registered the Infringing Domain Names, which they are using in connection with one or more Infringing Websites.

8. Since this Court’s entry of the TRO on January 23, 2012, I have discovered additional domain names registered by the Defendants that also incorporate one or more of the Burberry Trademarks or a confusingly similar variant thereof (the “Newly-Detected Domain Names”). Furthermore, the Defendants continue to use many of the Newly-Detected Domain Names in connection with Infringing Websites. The information that I have discovered linking the John Does Defendant Groups to all of the Infringing Domain Names, including the Newly-Detected Infringing Domain Names, is reflected in a chart attached as Exhibit A.

9. Because each Newly-Detected Domain Name unlawfully incorporates one or more of the Burberry Trademarks or a confusingly similar variant thereof, the Defendants’ registration, ownership, and operation of the Newly-Detected Domain Names violates the TRO.

10. The Complaint and TRO connect the individuals and entities responsible for registering the following twenty-two (22) Infringing Domain Names and for operating a number of related Infringing Websites: **2011Burberry-Outlet.com, 2011BurberryOutlet.info, BurberryOnline-Sale.com, Burberry-Outlet.us, Burberry-Outlet2011.com, Burberry-Outlet2011.net, BurberryOutletOnline.info, BurberryOutlet-Sale.info, Burberry-OutletSale.net, Burberry-OutletSale.org, BurberrySale-Online.com, BurberrySale-**

**Outlet.com, BurberrySaleOutlet.info, BurberrySaleOutlet.us, BurberrySale-USA.com, CheapBurberry-Outlet.com, DiscountBurberryOutlet.com, USBurberry-Outlet.com, 2011BurberrySale.com, BurberrySale-Outlet.net, BurberrysOutletOnline.info, and BurberryOutlet-Sale.us** (hereinafter, “John Doe Defendant Group 1”) (Compl. at ¶¶ 11-12).

Plaintiff has now discovered that John Doe Defendant Group 1 has without authorization and in violation of this Court’s orders, created and registered eight (8) Newly-Detected Domain Names, and operates a number of corresponding Infringing Websites associated with those Newly-Detected Domain Names as part of their online counterfeiting network in violation of the TRO. The Newly-Detected Domain Names registered by John Doe Defendant Group 1 include:

**BurberryHandbagsOutlet.info, Burberry-OnlineOutlet.com, Burberry-OutletSale.info, Burberry-OutletSale.us, BurberryOutletStore.info, Burberry-OutletStore.org, Burberry-OutletStore.us, and Burberry-SaleOutlet.com.**

11. The Complaint and TRO connect the individuals and entities responsible for registering the following three (3) Infringing Domain Names and for operating a number of related Infringing Websites: **Burberry-BagOutlets.com, Burberry-Bag-Outlets.com, and Burberry-BagsOutlet.com** (hereinafter, “John Doe Defendant Group 4”) (Compl. at ¶¶ 17-18).

Plaintiff has now discovered that John Doe Defendant Group 4 has without authorization and in violation of this Court’s orders, created and registered two (2) Newly-Detected Domain Names, and operates a number of corresponding Infringing Websites associated with those Newly-Detected Domain Names as part of their online counterfeiting network in violation of the TRO.

The Newly-Detected Domain Names registered by John Doe Defendant Group 4 include:

**Burberry-Sale-Outlet.com and Burberry-Sale-Outlets.com.**



12. The Complaint and TRO connect the individuals and entities responsible for registering the following sixteen (16) Infringing Domain Names and for operating a number of related Infringing Websites: **BurberryOutlet4u.org, BurberryOutlet-Online.org, BurberryOutletOnline4u.com, BurberryOutletOnline4u.net, BurberryOutletOnline4u.net, BurberryOutletOnline4u.org, BurberryOutletOnlinee.com, BurberryOutletOnlinee.net, BurberryOutletOnlinee.org, BurberryOutletOnlineShops.net, BurberryOutletss.org, BurberryStoreSale.com, OnlineBurberryOutlet.net, Online-BurberryOutlet.org, OnlinesBurberryOutlet.com, and Online-BurberryOutlet.net** (hereinafter, “John Doe Defendant Group 5”) (Compl. at ¶¶ 19-20). Plaintiff has now discovered that John Doe Defendant Group 5 has without authorization and in violation of this Court’s orders, created and registered two (2) Newly-Detected Domain Names, and operates a number of corresponding Infringing Websites associated with those Newly-Detected Domain Names as part of their online counterfeiting network in violation of the TRO. The Newly-Detected Domain Names registered by John Doe Defendant Group 6 include: **Onlines-BurberryOutlet.com and OnlinesBurberryOutlet.net.**


13. The Complaint and TRO connect the individuals and entities responsible for registering the following eight (8) Infringing Domain Names and for operating a number of related Infringing Websites: **Burberry1856.net, BurberryBags1856.net, Burberry-Bags-Outlet.com, BurberryForCheap.com, BurberryForSales.com, BurberryOutletFactory.com, BurberryOutletNew.net, and Burberry-Premium-Outlet.com** (hereinafter, “John Doe Defendant Group 7”) (Compl. at ¶¶ 23-24). Plaintiff has now discovered that John Doe Defendant Group 7 has without authorization and in violation of this Court’s orders, created and registered five (5) Newly-Detected Domain Names, and operates a number of corresponding

Infringing Websites associated with those Newly-Detected Domain Names as part of their online counterfeiting network in violation of the TRO. The Newly-Detected Domain Names registered by John Doe Defendant Group 7 include: **BurberryBags1856.com**, **BurberryBagsOutletSales.com**, **BurberryForSales.net**, **BurberryHandbagsSale.com**, and **MensBurberryOutlet.com**.

14. The Complaint and TRO connect the individuals and entities responsible for registering the following nine (9) Infringing Domain Names and for operating a number of related Infringing Websites: **Bur-Berry.com**, **BurberryCheapStore.com**, **BurberryOutletDresses.com**, **BurberryOutletDressss.com**, **BurberryOutletsDress.com**, **BurberryOutletsDresses.com**, **BurberryScarves.com**, **BurberrysOutletsDress.com**, and **CheapBurberrySelling.com** (hereinafter, "John Doe Defendant Group 8") (Compl. at ¶¶ 25-26). Plaintiff has now discovered that John Doe Defendant Group 8 has without authorization and in violation of this Court's orders, created and registered twelve (12) Newly-Detected Domain Names, and operates a number of corresponding Infringing Websites associated with those Newly-Detected Domain Names as part of their online counterfeiting network in violation of the TRO. The Newly-Detected Domain Names registered by John Doe Defendant Group 8 include: **BurberryFR.com**, **BurberryOutletSale.co**, **Burberry-Sac-Echarpe.com**, **Burberry-Sac-Echarpe.org**, **Burberry-Scarf.us**, **BurberryssOutletsDress.com**, **BurberrysssOutletsDress.com**, **BurberryTopShop.com**, **BuyBurberrys.com**, **Echarpe-Burberry-Sac.com**, **Echarpe-Burberry-Sac.info**, and **OutletBurberrySale.org**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 8, 2012

  
Melissa Roth, Esq.